

HB 5205: AN ACT CONCERNING CONSTRUCTION SAFETY REFRESHER TRAINING COURSES.

Senator Prague, Representative Ryan and members of the Committee

I am Walter B. Tucker Jr., of Hamden. I'm a trainer for trainer for the OSHA 10-hour Outreach Training in construction safety. I'm a Certified Safety Professional® (CSP) and a Construction Health and Safety Technician® (CHST). I'm president of Nutmeg Chapter, American Society of Safety Engineers, and, although I do not speak for them today, I am chairman of the Safety Committee of the Connecticut Chapter of the Associated Builders and Contractors, and a member of the Safety Committee of the Connecticut Construction Industries Association. I bring you 30 years' experience in occupational safety and health.

I'm here to point out a flaw in the proposed legislation, and to ask for an important change in it: Allow the required refresher training to be taught by not only by OSHA-authorized trainers, but by holders of certain certifications I believe equal or exceed OSHA's qualifications, and fill in the gap where OSHA instructors lack knowledge about regulations of the Mine Safety and Health Administration, referenced in the bill at hand, or telecommunications, also referenced in the bill's incorporation of Title 29, Code of Federal Regulations, Part 1910.268.

First, let me point out that the Occupational Safety and Health Administration offers two tracks in its Outreach Training Program: one for construction, and one for general industry. The bill at hand does not specify that the training be done by a construction trainer. Further, construction trainers know nothing about MSHA or general industry.

OSHA requires that would-be trainers first complete completion of Course 510, Occupational Safety and Health Standards for the Construction Industry. That is a 30-hour version of the 10-hour construction safety class required by this legislation. At the conclusion of the class, there is no examination to ensure that participants absorbed any of the material. They are given a certificate of completion, not a certificate of competence.

Then, candidates must complete Course 500, Trainer Course in OSHA Standards for the Construction Industry. Prerequisites for that course are: five years of construction safety experience OR three years of experience plus a college degree in occupational safety and health or certification as a Certified Safety Professional (CSP), or Certified Industrial Hygienist (CIH) designation, in the applicable training area.

OSHA trainers must take a refresher class every four years.

The Board of Certified Safety Professionals, which is accredited by the National Commission for Certifying Agencies, offers three levels of certification of safety expertise, each of which requires a college degree, 4 to 7 years' experience, and a passing grade on examinations totaling at least 5 hours. Those certifications are: Associate Safety Professional® (ASP), Graduate Safety Practitioner (GSP), or Certified Safety Professional® (CSP). The CSP must pass an additional 5½ hour test. In order to maintain certification, all of these certificants must complete documented continuing education and contribution to the profession.

Likewise, the Council for the Certification of Health, Environmental and Safety Technologists is accredited by the NCCA, and its certifications require a combination of education and experience, the passage of a 5-hour-long examination, and continuing education. It offers certifications as a Construction Safety and Health Technician® (CHST), an Occupational Safety and Health Technologist® (OHST) and a Certified Loss Control Specialist (CLCS). OSHA's compliance assistance specialist in Bridgeport is an OHST.

Finally, both the American Board of Industrial Hygiene and the Institute of Hazardous Materials Management are accredited by the Council of Engineering and Scientific Specialty Boards and American National Standards Institute. The former offers the Certified Industrial Hygienist (CIH) certification; the latter, Certified Hazardous Materials Manager (CHMM). Both require education, experience, examination and professional development for maintenance of certification.

In closing, I believe that the required refresher training should be given either by an OSHA-certified trainer or by a CSP, ASP, GSP, CHST, OHST, CLCS, CIH OR CHMM.

Thank you for your time and consideration.